

**IN THE UNITED STATES
DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA**

**UNITED STATES OF
AMERICA,**

V.

**JAMICA DELWAN LAWSON,
DEFENDANT.**

CASE NUMBER

2:07-CR-95-WHA

**MOTION TO CONTINUE
SENTENCING**

COMES NOW the defendant, Jamica Delwan Lawson by and through the undersigned counsel and moves this Honorable Court to continue his Sentencing Hearing currently set for February 27, 2008 by stating the following:

1. Defendant's sentencing is currently set for February 27, 2008 at 10:00 a.m.
2. On January 16, 2008, the Government filed a Motion to Substitute Counsel which was granted January 17, 2008.
3. The Presentence Report was prepared and provided to Counsel on January 16, 2008 and Counsel filed his objections to said report. Said objections raised by the Defendant were as to matters which the Defendant and the Government had a previous agreement, however, the US Attorney original a part of that agreement is no longer with the United States Attorney's Office.

4. Defendant's Counsel tried several times to contact Verne Speirs, AUSA regarding the Presentence Report and never received a return telephone call.

5. On Friday, February 22, Defense Counsel was informed that although a document was filed indicating that Verne Speirs is the counsel of record that in fact Clarke Morris represents the Government in this case. Counsel then attempted to contact Clark Morris, AUSA and was informed that she was out on Friday.

6. Counsel attempted to contact Clark Morris again on Monday, February 25 to be informed that she was out that day as well.

7. Counsel needs addition time in which to talk to Counsel for the Government, subpoena needed witnesses, obtain a copy of the transcript from the Detention Hearing and try and resolve the issued raised in the Presentence Report.

8. The issues raised in the Presentence Report are significant and will have a significant impact on the Defendant's sentence.

9. The final Presentence Report was received by the Defense Counsel on February 21, 2008 and counsel immediately began attempting to Verne Speirs who is not providing representation for the Government.

10. Although the undersigned was unable to talk with Clark Morris, Esq. he was told by a staff-member of the U. S. Attorney's office that there would be no objection to the Defendant's instant motion.

WHEREFORE, THE PREMISES CONSIDERED, Defendant prays that this Honorable Court will grant the foregoing and continue the Defendant's sentencing hearing.

RESPECTFULLY SUBMITTED this the 25th day of February, 2008.

/s/ Daniel G. Hamm

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CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of this Motion to Continue Sentencing by electronic transmission or by placing a copy in the United States Mail with sufficient postage for first class delivery to the attorneys named below.

DONE this the 25th day of February, 2008.

[/s/ Daniel G. Hamm](#)

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